



Penn E&R

Environmental & Remediation, Inc.



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(Rev)

March 8, 2002
4013-20000

VIA OVERNIGHT MAIL

Mr. Joseph McDowell (3HS21)
Remedial Project Manager
U.S. Environmental Protection Agency
Region III
1650 Arch Street
Philadelphia, PA 19103

Subject: Liberty Property Trust's 2301 Renaissance Boulevard Property,
Upper Merion Township, Montgomery County, PA

Dear Mr. McDowell:

This letter is being submitted in response to EPA's November 28, 2001 comment letter, which outlined comments the Agency had regarding its review of the October 10, 2001 report prepared by Penn E&R for the subject site entitled "Report of Findings for Limited Remedial Activities Implemented on Liberty Property Trust's 2301 Renaissance Boulevard Property, Upper Merion Township, Montgomery County, PA." Responses to the EPA's comments are provided below.

EPA's Comment No. 1

Pages 5 and 6: The NCP cancer risk range is 1E-6, not 1E-7, to 1E-4.

Response to EPA's Comment No. 1

The attached revised report for Excavation No.3 has been revised to reflect a risk range of 1×10^{-6} to 1×10^{-4} .

EPA's Comment No. 2

Table 1: The units (mg/kg) should be indicated.

Response to EPA's Comment No. 2

Table 1 in the attached revised report for Excavation No. 3 has been modified to indicate that the analytical data is presented in milligrams per kilogram (mg/kg).

EPA's Comment No. 3

Tables 4 and 7: The dermal ABS value used for dibenzofuran should be shown. Without this, the dibenzofuran risks could not be completely verified.

Response to EPA's Comment No. 3

Tables 6, 7 and 8 in the attached revised report for Excavation No. 3 have been modified to show the dermal ABS value used for dibenzofuran.

EPA's Comment No. 4

The Report, while addressing the human health risks posed by the contamination left in place, does not discuss its impact to groundwater. The report should include a discussion of the contamination's potential impacts to groundwater.

Response to EPA's Comment No. 4

The attached revised report for Excavation No. 3 has been revised to include a discussion of the potential impacts to ground water. As indicated in the revised report, the results of this evaluation indicate that soils remaining in Excavation No. 3 are not expected to have an adverse impact on ground water conditions.

EPA's Comment No. 5

Background, Page 1. This section references Figure 1 as a means of determining that Excavation No. 3 is located under the southeast berm of the detention basin. It appears that the correct reference should be Figure 2, or Excavation No. 3 should be designated on Figure 1.

Response to EPA's Comment No. 5

The Background Section for the attached revised report for Excavation No.3 has been revised to address EPA's Comment No. 5.

EPA's Comment No. 6

Remedial Activities, Page 2. The last paragraph identifies the analyses performed by identifying the specific contaminants. The report should clarify why the confirmation samples were limited to the parameters cited (e.g. COCs associated with the pipeline).

Response to EPA's Comment No. 6

These parameters were selected in the field with EPA's oversight contractor from Dynamac. They are considered appropriate indicator parameters for the contaminants detected in Excavation No. 3 and generally include the same polynuclear aromatic hydrocarbon compounds detected at elevated levels during the removal of the pipeline on the Yellow Parcel. The attached revised report for Excavation No. 3 has been modified to reflect this rationale.

EPA's Comment No. 7

Table 1. This table summarizes analytical results for each sample. The table includes two samples designated with a "DL"; SR-15DL and SR-16DL. The DL indicates that a dilution occurred. The table does not include sample results for either sample SR-15 or SR-16. As seen in Appendix B, sample results for SR-15 (dilution factor 1.0) generally had higher detected values than its diluted counterpart SR-15DL. Justification for utilizing the diluted analyses should be presented in the report. The conservative approach would be to use the higher of the analyses.

Response to EPA's Comment No. 7

Except for compounds outside the calibration range, the attached report for Excavation No. 3 has been revised to include the use of the higher of the undiluted versus diluted sample results for samples SR-15 and SR-16. For the compounds in the original samples that were outside the calibration range (i.e., benzo(a)anthracene and benzo(b)fluoranthene in sample SR-15 and benzo(b)fluoranthene in sample SR-16), the diluted sample results were used. Since the use of the higher of the undiluted/diluted results does not change the maximum concentrations used in the Focused Risk Assessment, there have been no changes to the conclusions (i.e., soils remaining in Excavation No. 3 do not pose an unacceptable risk to industrial or on-site adult construction workers) reached in the attached revised report for Excavation No. 3.

EPA's Comment No. 8

It should be noted that the direct-contact evaluation in this report was based on worker exposure only, consistent with the anticipated use of the site. Future unrestricted use of this area, if it is

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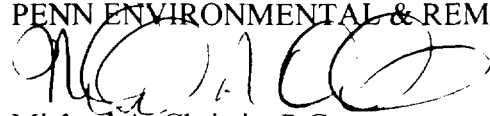
ever proposed, would not be appropriate until after the performance of additional site-specific risk assessments. LPT shall develop and submit to EPA Institutional Controls, as discussed in EPA's letter dated September 12, 2001.

Response to EPA's Comment No. 8

LPT will develop appropriate institutional controls to address potential exposure scenarios at the property not contemplated by the worker risk assessment and will submit a proposal to EPA under separate cover. LPT expects to submit a single proposal covering all institutional controls required at the property.

Should you have any questions regarding this letter or the attached revised report, or if you require additional information, please do not hesitate to call us.

Sincerely,
PENN ENVIRONMENTAL & REMEDIATION, INC.



Michael A. Christie, P.G.
Vice President

MAC:dlc
Enclosure
4013:epaexcno3rl

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